

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**GDC TECHNICS, LTD.**  
**Plaintiff,**

**v.**

**JAMES ROGER GRACE and**  
**J.R.G. DESIGN, INC.,**  
**Defendants.**

§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 5:15-CV-00488-RP**

**PLAINTIFF’S RESPONSE IN OPPOSITION TO**  
**THE SNELL LAW FIRM, P.L.L.C.’S OPPOSED MOTION TO WITHDRAW AS**  
**DEFENDANTS’ COUNSEL**

GDC Technics, Ltd. f/k/a Gore Design Completions, Ltd. (“GDC”) hereby files this Response in Opposition to The Snell Law Firm, P.L.L.C.’s (“The Snell Law Firm”) Opposed Motion to Withdraw as Defendants’ Counsel (“Motion”) [Dkt. #71] and respectfully requests that the Motion be denied.

1. GDC purchased the STC from JRG Design, Inc. in 2009 and intended to take possession of the certificate after the STC was amended by Roger Grace to add the Airbus 340-200 series aircraft to the approved model list. Mr. Grace abandoned the amendment for the Airbus this past March. GDC paid \$567,600.00 for the STC and an additional approximately \$200,000.00 for the modification. Mr. Grace has had the use of GDC’s money for a number of years and now that it is clear that he will not amend the STC, GDC seeks redress.

2. This lawsuit was filed on June 12, 2015. The Snell Law Firm has represented the defendants since the inception of the litigation. The parties have conducted discovery and are preparing for trial, set for March 20, 2017. If the Court permits The Snell Law Firm to withdraw, it will be difficult for new counsel to prepare in time for the trial when it is currently set and a continuance will be required.

3. Mr. Grace claims he does not have the funds to pay his attorney. While Mr. Grace can appear *pro se*, his company, the owner of the STC cannot. If Mr. Grace cannot pay his current attorney, then the likelihood of being able to pay a different attorney is questionable. This will further prejudice GDC by delaying the resolution of this matter.

WHEREFORE, PREMISES CONSIDERED GDC Technics, Ltd. prays that the Court deny The Snell Law Firm, P.L.L.C.'s Motion to Withdraw as Defendants' Counsel and for such other relief, whether at law or in equity to which the Court deems it is justly entitled.

DATED this 11<sup>th</sup> day of January, 2017.

Respectfully submitted,

RICHIE & GUERINGER, P.C.

BY: /s/ Katherine J. Walters

SHELDON E. RICHIE

State Bar No. 16877000

KATHERINE J. WALTERS

State Bar No. 00785174

100 Congress Avenue, Suite 1750

Austin, Texas 78701

512-236-9220 telephone

512-236-9230 facsimile

Email: [srichie@rg-austin.com](mailto:srichie@rg-austin.com)

Email: [kwalters@rg-austin.com](mailto:kwalters@rg-austin.com)

ATTORNEY FOR PLAINTIFF  
GDC TECHNICS, LTD.

### **CERTIFICATE OF SERVICE**

I hereby certify on the 11<sup>th</sup> day of January 2017, I caused the foregoing document to be electronically filed with the Clerk of the Court pursuant to the Electronic Filing Procedures and using the CM/ECF system, and that a true and correct electronic copy was thereby caused to be served on Defendants by and through their counsel of record.

/s/ Katherine J. Walters

Sheldon E. Richie/Katherine J. Walters